

**MEMO ENDORSED****Weil, Gotshal & Manges LLP**

U.S. DISTRICT COURT S.D.N.Y.  
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January 22, 2024

Via ECF

The Honorable Valerie Caproni  
 United States District Court for the Southern District of New York  
 40 Foley Square, Courtroom 443  
 New York, New York 10007

Re: *RSS CSMC2021-ADV-DE AUR, LLC v. Adventus US Realty #4 LP, et al.*, Case No. 1:23-cv-08231-VEC (the “**Action**”)

Dear Judge Caproni:

Pursuant to Rule 2(C) of Your Honor’s Individual Practices, Defendants Adventus US Realty #4 LP, Adventus US Realty #5 LP, Adventus US Realty #6 LP, Adventus US Realty #8 LP, Adventus US Realty #11 LP, Adventus US Realty #13 LP, Adventus AOF #1 LP, Adventus AOF #2 LP, and Adventus Holdings LP (collectively, “**Defendants**”), by and through their undersigned counsel and with the consent of Plaintiff RSS CSMC2021-ADV-DE AUR, LLC (“**Plaintiff**”), hereby request (i) an adjournment of the Initial Pretrial Conference that is currently scheduled for Friday, February 2, 2024 at 10:00 a.m. (the “**IPTC**”); (ii) an extension of the January 25, 2024 deadline for the parties to file the Joint Letter and Proposed Civil Case Management Plan as required by the Court’s December 11, 2023 Order [Doc. #52]; and, if the Court adjourns the IPTC, (iii) an extension of the deadline for Defendants to answer, move or otherwise respond to the Complaint [Doc. #1].

With respect to the IPTC, the parties have conferred and are available on the following alternate dates: March 22nd or March 29th. Accordingly, Defendants respectfully request that the Court adjourn the Initial Pretrial Conference to one of those dates. In addition, Defendants respectfully request that the Court reset the deadline for the submission of the Joint Letter and proposed Civil Case Management Plan to coincide with the new date for the IPTC.

Finally, Defendants request that the deadline for Defendants to respond to the Complaint be extended from January 31, 2024 until March 13, 2024.

The foregoing adjournment request and requested deadline extensions, which are the third such requests in this Action, are being sought to allow the parties to continue what are complex settlement discussions,

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which have been ongoing for over three months. The additional time afforded by the previously granted request for adjournment of the IPTC and extension of deadlines [*see* Doc. #52] has been essential in the parties' progress in their continued settlement discussions, and Defendants are hopeful additional time will facilitate complete resolution of the Action.

Respectfully,

*Robert S. Berezin*

Robert S. Berezin

cc: Counsel of Record (via ECF)

Application GRANTED. The Initial Pre-Trial Conference scheduled for Friday, February 2, 2024, at 10:00 A.M. is hereby ADJOURNED until **Friday, March 22, 2024, at 10:00 A.M.** The parties' joint letter and proposed case management plan as set forth at Dkt. 6 are due not later than **Thursday, March 14, 2024.** Defendants' deadline to answer or otherwise respond to the Complaint is extended from January 31, 2024, to **March 13, 2024.**

The Court is **unlikely** to grant any further extension requests absent **extraordinarily good cause.** The parties may request a referral to Magistrate Judge Cott for a settlement conference at any time.

SO ORDERED.

*Valerie Caproni* 01/22/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE